

Exhibit 10

Anna Armitage

From: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>
Sent: Friday, December 13, 2024 4:48 PM
To: Maricarmen Perez-Vargas
Cc: Mathew Harrington; Anna Armitage; Charlotte Edwards; Laura Smith; Sarah Armon; Bittle, Jacey; McFadden, Robert; Todaro, Anthony; Amy K. Alexander
Subject: RE: Mozilla/Teixeira - discovery responses
Attachments: Mozilla Response to Additional Terms Proposal (Moz Corp. and Individual Defs).pdf

Hi Maricarmen,

Thank you for your email and apologies for our delay, but we have been diligently processing the terms. Our response to your proposals is attached to this chart. For the most part, I think we can come to an agreement on most of these terms if you can limit them a bit. The main reason we are pushing back on most of the terms is because they hit on 500+ documents (and more than half of them hit on 1000+). For these terms, limiting the search to be “within” an amount of terms rather than using the connector “AND” will likely help narrow the searches down.

Have a nice weekend,
 Alex

Alex Cates

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From: Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>
Sent: Wednesday, December 11, 2024 10:12 AM
To: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Amy K. Alexander <Amy.Alexander@stokeslaw.com>
Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>
Subject: RE: Mozilla/Teixeira - discovery responses

⚠ EXTERNAL MESSAGE

Alex,

Since our e-mail from a month ago below, we have not heard anything from Mozilla Corporation in response to our proposed changes to Mozilla Corporation’s search terms for its ESI. Per our ESI agreement, the parties are required to engage in a meet and confer process to come to agreement regarding search terms and search methodology. Because we have not heard anything from Mozilla Corporation in response to our proposed changes to Mozilla Corporation’s

initial proposed search terms, and there has been no request for further discussion or a meet and confer, we assume Mozilla Corporation accepts our proposed changes and has begun the process of applying them to its ESI to identify responsive information.

Regards,

Maricarmen Perez-Vargas (she/her)

Attorney, AWI-CH

Stokes Lawrence, P.S.

1420 Fifth Avenue, Suite 3000 | Seattle, WA 98101-2393

direct: 206-892-2125

Maricarmen.Perez-Vargas@stokeslaw.com | stokeslaw.com

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From: Maricarmen Perez-Vargas

Sent: Tuesday, November 12, 2024 10:19 AM

To: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Amy K. Alexander <Amy.Alexander@stokeslaw.com>

Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>;

Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon

<sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert

<robert.mcfadden@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>

Subject: RE: Mozilla/Teixeira - discovery responses

Alex,

It's a pleasure to meet you. We request that you add the additional attached search terms to the terms you suggested below, as well as some edits to your proposed terms, to ensure all potentially relevant ESI is captured.

Regards,

Maricarmen

Maricarmen Perez-Vargas (she/her)

Attorney, AWI-CH

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From: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>
Sent: Tuesday, October 15, 2024 8:16 PM
To: Amy K. Alexander <Amy.Alexander@stokeslaw.com>
Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>
Subject: RE: Mozilla/Teixeira - discovery responses

Hi Amy,

Per the terms of the ESI agreement, see below for our disclosures.

Custodians

1. Steve Texeira, Plaintiff
 - a. Emails
 - b. Google Drive
 - c. Box folder
2. Mitchell Baker, Defendant, Former Chief Executive Officer of Mozilla Corporation, Inc.
 - a. Emails
 - b. Google Drive
 - c. Cellphone
3. Laura Chambers, Defendant -Current Chief Executive Officer of Mozilla Corporation, Inc.
 - a. Emails (beginning 2/6/24)
 - b. Google Drive
 - c. Cellphones (2)
4. Dani Chehak, Defendant - Current Chief People Officer of Mozilla Corporation, Inc.
 - a. Emails
 - b. Google Drive
 - c. Cellphone

Non-Custodian Data Sources

1. Slack - given the way manner in which Slack was stored during the relevant time period, Slack data is not organized by custodian. Instead, we have a snapshot of Slack data taken on May 15, 2024. Mozilla's Slack retention policy is 6 months, so the snapshot captures all Slack data 6 months prior to the date of the snapshot.

Third party data sources

1. Cell phone accounts for Mitchell, Laura, and Dani, as mentioned above. We are currently in the process of imaging Laura, Mitchell, and Dani's cellphones.

Inaccessible Data

1. As mentioned above, Slack data is only retained for 6 months pursuant to Company policy.

Search Methodology

1. In response to your RFPS, we propose to search the above-listed custodial email and google drive accounts from August 1, 2022 through the May 18, 2024, as well as all Slack data, that mention the following terms for documents:
 - a. Promot* w/3 (President or CEO)
 - b. CEO w/10 President
 - c. CEO w/3 transition
 - d. CEO w/5 Steve
 - e. Potential w/4 succession
 - f. Replac* w/5 CEO

- g. Succession /4 plan*
- h. “SVP New Products”
- i. “SVP Technology”
- j. Feedback and Steve
- k. “Performance Review” and Steve
- l. Steve w/20 performance

Thank you,
Alex

Alex Cates

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From: Cates, Alexandria
Sent: Wednesday, September 25, 2024 2:58 PM
To: Amy K. Alexander <Amy.Alexander@stokeslaw.com>
Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>
Subject: RE: Mozilla/Teixeira - discovery responses

Hello Amy,

The ESI agreement specifically states that the information you are requesting below be provided within 30 days of the order. The ESI order was entered on September 16th. We will follow the order and get you the information that you are requesting within 30 days, or not later than October 16th. Given the number of individuals implicated in this case and amount of data that we are still in the process of collecting, we cannot give you all of the information you demand by tomorrow. To date, we have collected more than 750,000 emails, slack messages, and documents. We are still in the process of collecting more. Given the immense amounts of data that we have to collect and review in order to respond to your requests, this is going to take us some time.

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From: Amy K. Alexander <Amy.Alexander@stokeslaw.com>
Sent: Tuesday, September 24, 2024 9:49 AM
To: Cates, Alexandria <Alexandria.Cates@us.dlapiper.com>; Todaro, Anthony <Anthony.Todaro@us.dlapiper.com>
Cc: Mathew Harrington <Mathew.Harrington@stokeslaw.com>; Maricarmen Perez-Vargas <Maricarmen.Perez-Vargas@stokeslaw.com>

Vargas@stokeslaw.com; Anna Armitage <Anna.Armitage@stokeslaw.com>; Charlotte Edwards <charlotte.edwards@stokeslaw.com>; Laura Smith <Laura.Smith@stokeslaw.com>; Sarah Armon <sarah.armon@stokeslaw.com>; Bittle, Jacey <Jacey.Bittle@us.dlapiper.com>; McFadden, Robert <robert.mcfadden@us.dlapiper.com>

Subject: Mozilla/Teixeira - discovery responses

 EXTERNAL MESSAGE

Hello Alex and Anthony,

I'm writing with some initial concerns about Defendants' responses to Plaintiff's first set of requests for production. Specifically, on RFP 3-5, Mozilla Corporation states that it will produce communications that "contain search terms agreed to by Plaintiff and Defendant." The same is true for RFP 1 to Ms. Chehak, Ms. Baker, and Ms. Chambers. These responses do not comply with the ESI Protocol, which was negotiated and agreed to nearly contemporaneously with Defendants' responses. Under our ESI Protocol, the producing party must first disclose data sources, including custodians, search terms and queries, file type and date restrictions, and other methodology used to locate responsive ESI and discoverable information, which would include the extent to which Defendants have engaged third party vendors to locate responsive documents. Only after this disclosure might the parties meet and confer about agreed search terms.

We served discovery requests nearly two months ago. It appears that Defendants have not even begun the collection of ESI, and are improperly refusing to do so until Plaintiff provides search terms. This is contrary to the ESI Protocol. We ask that you comply with the ESI Protocol and disclose required initial information no later than Friday, September 27. Please note that Defendants are obligated not only to provide documents found via search terms, but also to locate and produce documents generally responsive to our requests, independent of search terms. At this time, MoCo has produced less than 20 pages of documents in response to our requests, and the individual defendants have produced none. When you respond with the required ESI information, please also advise when Defendants will produce additional documents.

Sincerely,

Amy Kangas Alexander (she/her)
 Shareholder | Stokes Lawrence, P.S.
 Seattle, Washington | (206) 892-2161 | Amy.Alexander@stokeslaw.com

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Terms Proposed by Mozilla Corp	Sources	Date Limitation	SL Edits	Mozilla Response*
promot* w/3 (President or CEO)	ALL*	8/1/2022 - Present		
CEO w/10 President	ALL	8/1/2022 - Present		
CEO w/3 transition	ALL	8/1/2022 - Present		
CEO w/15 Steve*	ALL	8/1/2022 - Present	CEO w/3 Steve*	We agree to your edits.
Potential w/4 succession	ALL	8/1/2022 - Present		
Replac* w/5 CEO	ALL	8/1/2022 - Present		
Succession /4 plan*	ALL	8/1/2022 - Present		
"SVP New Products"	ALL	8/1/2022 - Present		
"SVP Technology"	ALL	8/1/2022 - Present		
Feedback and Steve	ALL	8/1/2022 - Present	Feedback AND Steve*	We agree to your edits.
Steve w/20 performance	ALL	8/1/2022 - Present	"Performance Review" AND Steve*	We agree to your edits.
Steve* w/20 perform*	Steve* w/20 perform*			We agree to your edits.
Teixeira Additional Terms Requested	Sources	Date		
Limitation				
Steve* AND Title	ALL	10/1/2023 - Present		Please narrow this proposal.
Steve* AND Change*	ALL	10/1/2023 - Present		Please narrow this proposal.
Steve* AND absence*	ALL	10/1/2023 - Present		Okay.
Steve* AND Employ*	ALL	10/1/2023 - Present		Please narrow this proposal.
Steve* AND Leave	ALL	10/1/2023 - Present		Please narrow this proposal.
Steve* AND Terminat*	ALL	10/1/2023 - Present		Okay.
Steve* AND Farewell	ALL	10/1/2023 - Present		Okay.
CEO AND hire*	ALL	10/1/2022 - Present		Please narrow this proposal.
CEO AND Succession	ALL	10/1/2022 - Present		Please narrow this proposal.
SLACK (Exclude Steve as Custodian)	Mitchell Baker (Personal Email - mitchellbaker@remix@gmail.com) Laura Chambers (Personal Email - lpelle@gmail.com)	5/1/2022 - Present		Due to the format of the Slack data at the time it was collected, we cannot filter slack data by custodians. This term is therefore overbroad and unduly burdensome. All of the terms we have agreed to herein have been applied to the Slack data, so all relevant information should be captured.
Steve* AND Teixeira		5/1/2022 - Present		We will agree to apply this term to the personal email accounts.
Steve* AND Eval*	ALL	None		Please narrow this proposal.
Steve* AND Cancer	ALL	9/1/2023 - Present		Okay.
Steve* AND diagnos*	ALL	9/1/2023 - Present		Okay.
Steve* AND AI	ALL	1/1/2022 - Present		Please narrow this proposal.
Steve* AND "artificial intelligence"	ALL	1/1/2022 - Present		Please narrow this proposal.
Steve* AND melanoma	ALL	9/1/2023 - Present		Okay.
Steve* AND treat*	ALL	9/1/2023 - Present		Please narrow this proposal.
Steve* AND surgery	ALL	9/1/2023 - Present		Okay.
Steve* AND performance	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND FWA	ALL	9/1/2023 - Present		Okay.
Steve* AND "Caring Bridge"	ALL	9/1/2023 - Present		Okay.
Steve* AND caringbridge	ALL	9/1/2023 - Present		Okay.
Steve* AND (promot* OR President OR CEO)	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND officer	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND eve	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND Chief	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND narrative	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND layoff*	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND RIF	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND "item"	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND "generative ai"	ALL	8/1/2022 - Present		Please narrow this proposal.
Steve* AND "gen ai"	ALL	8/1/2022 - Present		Okay.
Steve* AND discriminat*	ALL	9/1/2023 - Present		Okay.
Steve* AND complain*	ALL	9/1/2023 - Present		Okay.

Steve* AND demo*	ALL	8/1/2022 - Present	Okay.
Steve* AND bonus	ALL	8/1/2022 - Present	Please narrow this proposal.
Steve* AND LTP	ALL	8/1/2022 - Present	Okay.
Steve* AND IAP	ALL	8/1/2022 - Present	Okay.
Steve* AND MAP	ALL	8/1/2022 - Present	Please narrow this proposal.
Steve* AND blueprint	ALL	6/1/2023 - Present	Okay.
Lindsey AND Social	ALL	10/1/2023 - Present	Please advise on how this term is relevant, as well as narrow the term proposal, and we will consider.
Lindsey AND Leyla	ALL	10/1/2023 - Present	Please advise on how this term is relevant, as well as narrow the term proposal, and we will consider.
Steve* AND reentry	ALL	10/1/2023 - Present	Okay.
Steve* AND onboard*	ALL	10/1/2023 - Present	Please narrow this proposal.
Steve* AND Dani AND Lavonne	ALL	8/1/2022 - Present	Please narrow this proposal.
Steve* AND Dani AND Hannah	ALL	8/1/2022 - Present	Please narrow this proposal.
Steve* AND Mitchell AND Bellevue	ALL	8/1/2022 - Present	Okay.
Steve* AND Dani AND direct*	ALL	8/1/2022 - Present	Please narrow this proposal.
Steve* AND Dani AND Fireside	ALL	8/1/2022 - Present	Okay.
Steve* AND Laura AND fireside	ALL	8/1/2022 - Present	Okay.
Steve* AND pancreas	ALL	9/1/2023 - Present	Okay.
Steve* AND liver	ALL	9/1/2023 - Present	Okay.
Steve* AND metastat*	ALL	9/1/2023 - Present	Okay.
Steve* AND resign*	ALL	9/1/2023 - Present	Okay.
Steve* AND quit*	ALL	9/1/2023 - Present	Please narrow this proposal.

*Note that Mozilla's response requesting an edit to the term does not mean that Mozilla is waiving any objections to the term.